

**From:** [Dan Peacock](#)  
**To:** [Bill Jacobs](#)  
**Subject:** Fw: Risk mitigation measures for rodenticides-- need for "pre-baiting" rodenticide bait stations.  
**Date:** 03/03/2010 09:22 AM

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Bill,

Am I missing something? I thought that we included protocols in the 5/28/2008 RMD.

Thank You,

Daniel B. Peacock, Biologist  
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**Addresses:**

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 03/03/2010 09:20 AM -----

**From:** Kable Davis/DC/USEPA/US  
**To:** anie lauzon <[anie.lauzon@hc-sc.gc.ca](mailto:anie.lauzon@hc-sc.gc.ca)>  
**Cc:** Dan Peacock/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA  
**Date:** 03/02/2010 04:13 PM  
**Subject:** RE: Risk mitigation measures for rodenticides-- need for "pre-baiting" rodenticide bait stations.

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Anie-

Thanks for the email. Please see below for answers to your questions.

1. Yes we have. I can think of at least one tier 3 station, which was registered by Dan Peacock (copied). For more information, please contact Dan Peacock.
2. While there is no protocol or SOP, we will accept "white papers" and review the studies. However, registrants are not required to send us the studies. For more information, please contact Dan Peacock.
3. I do believe we keep a list, however I'm not sure how up to date it is. For more information, please contact Bill Jacobs (copied). He should be able to go into more detail.

If you need help contacting any of the above staff, please let me know. Enjoy the rest of your work week!

Sincerely,  
Bo

Kable Bo Davis  
Acting Product Manager (07)  
U.S. Environmental Protection Agency  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
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▼ anie lauzon ---03/02/2010 08:31:39 AM---Good morning.

From: anie lauzon <anie.lauzon@hc-sc.gc.ca>  
To: Laura Parsons/DC/USEPA/US@EPA  
Cc: Dan Peacock/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Kable Davis/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA  
Date: 03/02/2010 08:31 AM  
Subject: RE: Risk mitigation measures for rodenticides-- need for "pre-baiting" rodenticide bait stations.

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Good morning,

Thank you, Laura, for sending my request to your colleagues. The PMRA is currently planning the implementation of new risk mitigations measures for eight rodenticides in Canada, including the requirement that domestic class products be packaged with at least one tamper-resistant bait station. I have the following questions, which I thought could probably be best answered by the Registration Division, along with my initial question (see email below):

- 1- Has the EPA received submissions for products sold with Tier 1, 2 or 3 bait stations thus far?
- 2- If so, what is the process (SOP) when evaluating the data sent along with the bait stations (e.g. results of tamper-resistance studies)? The PMRA feels that our process should be in line with the EPA's.
- 3- Does a list of acceptable bait stations exist, or if one being put together by the EPA?

Please let me know if you have any questions.

Thank you for your assistance,

Anie Lauzon  
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**From:** Parsons.Laura@epamail.epa.gov  
[mailto:Parsons.Laura@epamail.epa.gov]  
**Sent:** February 25, 2010 5:30 PM  
**To:** anie lauzon  
**Cc:** Peacock.Dan@epamail.epa.gov; Gaines.Jennifer@epamail.epa.gov;  
Davis.Kable@epamail.epa.gov; Wasem.Russell@epamail.epa.gov  
**Subject:** Re: Risk mitigation measures for rodenticides-- need for  
"pre-baiting" rodenticide bait stations.

Hi Anie,

I do not believe that we got this comment that a  
'pre-baited station  
with refills' would be much more expensive than a  
'station with  
refills'.

I don't remember the rationale behind why we thought  
that "pre-baiting"  
was necessary, but I am copying my colleagues in  
Registration Division  
to see if they have heard this comment from  
registrants or if they have  
strong opinions about whether the station should be  
pre-baited.

Hopefully, one of them can shed some light on this  
issue for us.

Thanks,  
Laura Parsons  
Pesticide Re-evaluation Division  
Office of Pesticide Programs

From: anie lauzon <anie.lauzon@hc-  
sc.gc.ca>

To: Laura Parsons/DC/USEPA/US@EPA  
Date: 02/25/2010 09:32 AM  
Subject: Risk mitigation measures for  
rodenticides

Good morning,

I have another quick question regarding the risk mitigation measures for rodenticides being implemented in the U.S. In your Risk Mitigation Decision for Ten Rodenticides document, it states that "consumer size" products need to be sold packaged with a ready-to-use (pre-baited) bait station (p. 13).

Health Canada's Pest Management Regulatory Agency (PMRA) is proposing the requirement of mitigation measures similar to those being implemented in the U.S., and has published a consultation document (REV2009-05). Comments were received with regards to the requirement that the bait station be 'pre-baited' when packaged with more than one refill. It was argued that having the bait station pre-baited would not provide a benefit to the user and would result in an additional cost for registrants that will be passed on to consumers.

I would like to know if the USEPA has received similar comments, and if this requirement is being implemented.

Thank you for your assistance,

Anie Lauzon  
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